

# Cole Schotz P.C.

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September 15, 2022

**Via CM/ECF Filing**

Honorable John Michael Vazquez, U.S.D.J.  
United States District Court for the District of  
New Jersey  
Martin Luther King Building & U.S.  
Courthouse, Courtroom PO 03  
50 Walnut Street  
Newark, New Jersey 07102

Honorable James B. Clark, III, U.S.M.J.  
United States District Court for the District of  
New Jersey  
Martin Luther King Building & U.S.  
Courthouse, Courtroom MLK 2A  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Redi-Data, Inc. v. The Spamhaus Project a/k/a The Spamhaus Project Ltd.*,**  
**Case No. 2:20-cv-17484-JMV-JBC**

Dear Judge Vazquez and Judge Clark:

This firm represents plaintiff, Redi-Data, Inc. ("Redi-Data"), in the above-referenced matter. We write to respectfully request a 30 day extension of the jurisdictional discovery end date (from October 3, 2022 to November 2, 2022). In addition, Redi-Data is also seeking an adjournment of the September 21, 2022 status letter deadline and the September 27, 2022 telephone status conference to a date convenient for the Court closer to the new jurisdictional discovery end date. Defendant, The Spamhaus Project ("Defendant"), consents to this request. \*

Redi-Data respectfully submits that sufficient good cause exists for the requested extension and adjournments. Pursuant to the August 2, 2022 Order [Dkt. No. 25], Redi-Data served written discovery demands that Defendant has responded to. Although the parties timely began a meet and confer process over certain alleged deficiencies in Defendant's responses, the parties have since begun exploring the possibility of settlement.

Accordingly, to avoid the incurrence of potentially unnecessary costs, and out of respect for the Court's time and resources, Redi-Data respectfully requests that the relief sought herein be granted. As always, the Court's time and attention to this matter are greatly appreciated.

\* The parties shall submit their status letter  
by October 19, 2022.

Respectfully Submitted,

COLE SCHOTZ P.C.

\* The telephone status conference scheduled for  
September 27, 2022 is adjourned to October 25, 2022 at 12:00 PM  
cc: All Counsel of Record Via CM/ECF

/s/ *Elizabeth A. Carbone*  
Elizabeth A. Carbone

**SO ORDERED**

*s/James B. Clark*

**James B. Clark, U.S.M.J.**

**Date: 9/19/22**